

24 August 2009

S09.20

**Australia/New Zealand Standard Child Restraint Systems for use in motor vehicles  
Revision of AS/NZS 1754:2004**

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 50 nationally organised societies and national members. NCWNZ has 26 branches throughout the country attended by representatives of those societies and some 150 other societies. The Council's function is to serve women, families and the community through research, study, discussion and action.

The Council, as the spokesperson for these women's groups, has had a long term interest in the development of standards in New Zealand. NCWNZ has been actively involved in road safety issues and made their first submission regarding child restraints systems for use in motor vehicles in 1978.

While NCWNZ does not have the in-depth knowledge and expertise to comment on the more technical and complex sections of this draft document e.g. the materials, design and construction, performance and testing; their overarching concern is for the safety of children using child restraint systems in motor vehicles. Members of the Nucleus Committee of the Consumer Affairs Standing Committee have considered this document and wish to make the following observations and general comments:

1. We endorse the major changes to child restraint systems for use in motor vehicles as outlined in the draft document. The requirements for larger booster seats – Type F, removal of booster cushions and guidance on seat requirements with respect to the child's age will address concerns re safety and provide a higher level of protection for children travelling in motor vehicles.
2. We support the changes and attention to detail to several previous areas of concern e.g. flammability, toxicity and stabilisation of plastic used in the seat manufacture. Also checking dynamic performance of the child restraint upper anchorage and components and extension straps was considered a necessary priority when upgrading the standard.
3. We agree that general information and instructions for installation, use and maintenance should be provided in a booklet or sheet and attached to the child restraint. Instructions should be written in English with clear and legible printing either with initial capital and lower case letters or all capital letters. Illustrated instructions, we agree, are necessary and should be used where appropriate. Diagrams showing correct methods of attachment and use of

the child restraint are essential, as there is a growing percentage of the population with English as a second language and limited understanding of written language.

4. ACC Child Restraint Checking Clinics found that in 35% of the child restraints they monitored during 2005, parents had made at least one error in installation e.g. not using the tether strap or using it incorrectly and misusing the car safety belt when securing the restraint. These errors indicate the importance of illustrated instruction and diagrams showing correct methods of attachment and use being available.
5. As all child restraints sold in New Zealand must, by law, meet at least one of three specified standards. NCWNZ is concerned that imported child restraints are not monitored. It is possible for a distributor to import a restraint that does not meet any of these standards. A few retail outlets or Trade Me may offer these for sale with no compliance label attached.
6. We would like to see increased advertising and education campaigns for the consumer (namely parents and carers) to ensure they look for, and purchase child restraints for used in motor vehicles that meet a recognized safety standard.
7. The new requirements for marking minimum and maximum shoulder heights on a child restraint will make selection and use of an appropriate size of a child restraint easier for parents and carers. The more direct approach, built into the standard, is an acceptable improvement.

NCWNZ thanks the Joint Committee of Standards Australia/Standards New Zealand for the opportunity to comment on this draft document and wishes to commend the Committee for the research that has been undertaken to review and change the 2004 Standard.

Elizabeth Bang  
**National President**

Jan Brown  
**Convener Consumer Affairs Standing Committee**